

Danner, Ward

From: Dadap, Nathan C.
Sent: Thursday, October 24, 2013 10:16 AM
To: Brenner, Rita
Cc: Paul Parmentier; Ragland, Ken; Foley, Chris; 'Neil Irish'
Subject: RE: Clarification regarding disposal of PCB Waste

Hi Rita,

Since California regulates PCBs from 5 – 50 ppm, I would refer you to the folks over at DTSC for manifest requirements of PCB contaminated waste below 50 ppm. General manifesting requirements for PCBs over 50 ppm can be found in 40 CFR 761.207(a). In short, the main things that need to be identified are the type of waste (soil), the removal from service for disposal date (when it was excavated), and the weight in kilograms of waste. I would imagine that similar requirements would apply for below 50ppm waste, since it is treated by the state as hazardous waste, but I would recommend you get the requirements from them directly.

Thanks,
Nathan

Nathan Dadap
U.S. EPA Region 9
RCRA Facilities Management
75 Hawthorne Street
San Francisco, CA 94105

Phone: (415) 972-3654
Fax: (415) 972-3530

From: Brenner, Rita [<mailto:RBrenner@portla.org>]
Sent: Thursday, October 24, 2013 9:31 AM
To: Dadap, Nathan C.
Cc: Paul Parmentier; Ragland, Ken; Foley, Chris; 'Neil Irish'
Subject: RE: Clarification regarding disposal of PCB Waste

Thanks Nathan. Can you also clarify how the manifests for soils with PCB wastes <50 ppm are to be labeled for this project? In particular, would manifests for soils with less than 50 ppm PCB's still be required to be specifically identified and called out as a "TSCA waste"?

Rita

From: Dadap, Nathan C. [<mailto:DADAP.NATHAN@EPA.GOV>]
Sent: Wednesday, October 23, 2013 5:02 PM
To: Brenner, Rita
Cc: Paul Parmentier
Subject: Clarification regarding disposal of PCB Waste

Hi Rita,

Paul had mentioned to me today that the Port of LA wanted some clarification regarding the disposal of PCB waste based on the concentration. You can find the requirements listed in 40 C.F.R. § 761.61(a)(5), but in summary:

1. Soils (which constitute “Bulk PCB remediation wastes”) with concentrations below 50 ppm DO NOT need to be disposed of in a hazardous waste landfill.

761.61(a)(5)(i)(B)(2)(ii) – Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

Those facilities include:

- (1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
- (2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§ 257.5 through 257.30 of this chapter, as applicable.
- (3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
- (4) A PCB disposal facility approved under this part.

2. Soils with concentrations 50 ppm or above DO need to be disposed of in a TSCA-approved landfill.

761.61(a)(5)(i)(B)(2)(iii) – Bulk PCB remediation wastes with a PCB concentration ≥50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.

Hope that provides some clarification. Please let me know if you have any other questions.

Thanks,
Nathan

Nathan Dadap
U.S. EPA Region 9
RCRA Facilities Management
75 Hawthorne Street
San Francisco, CA 94105

Phone: (415) 972-3654
Fax: (415) 972-3530

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